

**BAKER & HOSTETLER LLP**

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*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,  
v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,  
v.

WALTER FRESHMAN TRUST A, a Florida trust,  
WALTER FRESHMAN REVOCABLE TRUST  
DATED 12/31/92, a Florida trust, FRIEDA  
FRESHMAN REVOCABLE TRUST DATED  
12/31/92, a Florida trust, and FRIEDA  
FRESHMAN, as trustor, as trustee, and as an  
individual, AMANDA LEFKOWITZ, and IAN  
LEFKOWITZ,

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05026 (SMB)

Defendants.

**AMENDED CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. Fact Discovery shall be completed by: August 2, 2019.
2. The Disclosure of Case-in-Chief Experts shall be due: October 7, 2019.
3. The Disclosure of Rebuttal Experts shall be due: December 11, 2019.
4. The Deadline for Completion of Expert Discovery shall be: January 6, 2020.
5. The Deadline for Service of a Notice of Mediation Referral shall be: On or before January 13, 2019.
6. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before January 27, 2020.
7. The Deadline for Conclusion of Mediation shall be: On or before May 25, 2020.

Dated: New York, New York  
November 12, 2019

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona

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